

**JBS&G 70609 | 174265 (Rev 1)**

**L049 Bradfield Internal SSDA - 97688711 Cover letter (Rev 1)**

5 May 2026

Lachlan O'Reilly  
Goodman Property Services (Aust) Pty Ltd  
Via email: Lachlan.oreilly@goodman.com

**SSDA 97688711: SEARs Site Contamination Assessment (PSI/DSI) and Remedial Action Plan (RAP) Advice Construction, Fit-Out and Operation of 14 Warehouses, Active Open Space and Amenities Precinct Former Badgerys Creek Quarry and Brick Making Site, 225-245 Martin Road, Badgerys Creek, NSW, 2555**

Dear Lachlan,

JBS&G Australia Pty Ltd (JBS&G) has been engaged by Goodman Property Services (Aust) Pty Limited (Goodman, the Client) to provide specialist site contamination consultancy services associated with the former Badgerys Creek Quarry and Brick Making Site, located at 225-245 Martin Road, Badgerys Creek, NSW, 2555 (the site). The site is legally identified as Lots 1 to 3 in Deposited Plan (DP) 1278780 and Lots 55 & 56 in DP 3050 and occupies a total area of approximately 190 hectares (ha).

This advice has been prepared by JBS&G to address the site-specific Secretary's Environmental Assessment Requirements (SEARs) received in respect of the proposed State Significant Development Application (SSDA) No. 97688711. The proposed development is being undertaken by Goodman Property Services (Aust) Pty Ltd (Applicant) on behalf of Goodman Western Sydney Pty Limited as trustee for the Goodman Western Sydney Trust (Owner).

The SSDA seeks approval for the construction, fit-out (including office and warehouse racking) and operation of 14 warehouse buildings, Active Open Space & amenities precinct (including a café) and internal site infrastructure works. Specifically, this will include:

- **Warehouse and Distribution Buildings inclusive of:**
  - 24/7 use of the Warehouse and distribution use for all warehouse buildings.
  - A total developable site area of approximately 1,124,286 sqm (or 112.4 Ha), comprising construction, fit-out and operation of approximately 597,610 sqm of warehouse and office GLA space across 14 small, medium and large format warehouses, ancillary offices and onsite parking. Warehouses range between 10,000sqm to 100,000sqm with heights of either 14.6m or 16.8m (excluding rooftop plant and solar).
    - The above Warehouse and Distribution buildings will also include guardhouses, dock offices loading bays, landscaping, electric vehicle charging, solar panels and signage.
- **Active Open Space & Amenities Precinct:**
  - Active Open Space & public amenities precinct (including a café) totalling approximately 708 sqm of GLA. Location on the Western Enterprise zone to align with Connecting with Country outcomes.

- **Internal Estate Infrastructure:**

- Construction of the following roads, and associated services infrastructure (being electricity, potable, recycled & wastewater and telecommunications network):
  - Internal estate council roads.
  - Internal estate collector roads as identified on the Precinct Plan.
  - Internal estate retaining walls (including importation of engineered fill for backfill of walls)
  - Corridor reservation, design and partial construction of the following primary arterial roads located within the site:
    - Corridor reservation for the Eastern Ring Road (ERR) between the northern site boundary and southern site boundary.
    - Corridor reservation, design and construction (50%) of 'H-Road' being the East-West connection between the proposed ERR intersection and eastern collector road intersection within the site.
- Reservation of the remaining 'H-Road' corridor to the east of the proposed eastern collector road (N.B. this corridor will ultimately form part of a future arterial regional road connection between Devonshire Road and the ERR identified in Schedule 3 – List of Infrastructure in the Aerotropolis Special Infrastructure Contribution).
- Regional stormwater and drainage infrastructure (on behalf of Sydney Water) identified within the ENZ land. This will include:
  - Stormwater Basins per the Sydney Water Integrated Stormwater Management Scheme.
  - Sediment Basin.
  - Bio retention Basin.
  - Wetland Basin.
  - Pond.
  - Trunk Drainage channels as identified per the Integrated Stormwater Management Scheme.

- **Other:**

- Landscaping across the Site in accordance with Precinct Plan, Connecting with Country and Airport Safeguarding requirements.
- Vegetation Management Plan (VMP),
- 3 x 12m Estate Identification Pylon Signs on Lots 6, 7 and 8 (excludes individual Warehouse wayfinding signage).
- Public art within the western active open space & amenity precinct.
- Subdivision of the estate.

### **Related Applications/Activities**

#### **Part 5 Activity – External Works Lead in Roads and Services**

The Applicant is proposing access to the Site via the following route which will be upgraded to be in accordance with the Precinct Plan.

#### Part 1 - Martin Road / Elizabeth Drive intersection upgrades

- It is expected that these works will be undertaken by Transport for New South Wales (TfNSW) via an amendment to the existing Part 5 Activity Approval issued by TfNSW for the Elizabeth Drive Upgrade.
- It is understood that TfNSW will undertake these works with a target completion date of December 2029 (being prior to target date of operations for the first warehouse building at the site);

#### Part 2 -4 - Martin Road / East West Collector Road / Lawson Road Upgrades

- Further to Part 1, access to the site is proposed to be constructed concurrently as follows:
  - Part 2 – access from the Martin Road / Elizabeth Drive intersection will continue down Martin Road and join the future east / west collector road identified within the Precinct Plan through Lot 36 DP 3050.

The portion of road between the Elizabeth Drive intersection and future east / west collector road will be upgraded with a temporary access strategy to be agreed with Council consistent with Part 3.2, Requirement DS5 of the Precinct Plan.
  - Part 3 – The east / west collector road through Lot 36 DP 3050 will be delivered in ultimate form to connect Martin Road with Lawson Road consistent with its designation under the Precinct Plan and relevant cross section within the Aerotropolis DCP.
  - Part 4 – From the east / west collector road connection on Lawson Road, the portion of Lawson Road south through to the Site will be upgraded in ultimate form consistent with its designation under the Precinct Plan and relevant cross section within the Aerotropolis DCP.
- Goodman have discussed the approach outlined within Parts 2-4 with Liverpool City Council. The anticipated completion date for these upgrades is December 2029, based on a commencement date of June 2028. These works are expected to be completed by Council prior to operation of the first warehouse building at the site.

#### Rehabilitation, Quarrying and Bulk Earthworks SSDA 97711727

Further to this, a separate SSDA No. SSD-97711727 has been proposed by the Applicant for site preparation works only (i.e. no buildings, retaining walls or other infrastructure works), including the rehabilitation of areas disturbed by historic mining and brick-making operations, as well as remediation and bulk earthworks across other areas of the site to make the site suitable for intended future land use. The proposed application also seeks approval for demolition of any remaining structures on the Site.

Cumulatively, these three applications together, seek to facilitate the development of a new industrial estate at the Site.

To support the earlier SSDA, No. SSD-97711727, JBS&G has prepared the following documents:

- Combined Preliminary and Detailed Site Investigation, 225-245 Martin Road, Bradfield NSW 2556, 18 February 2026, Rev A, JBS&G Australia Pty Ltd (JBS&G 2026a).
- SSD-97711727 Site Wide Remedial Action Plan, 225-245 Martin Road, Bradfield NSW 2556, 2 March 2026, Rev A, JBS&G Australia Pty Ltd (JBS&G 2026b).

In relation to the SEARs checklist for 97688711<sup>1</sup>, **Table A** following presents a compliance summary with reference to the accompanying documents.

**Table A Investigation Checklist**

| Agency / Documentation Requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Relevant Section of Report                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Department of Planning, Housing and Infrastructure (DPHI)<br/>(incorporating Government Agency comments from Liverpool City Council)</p> <p><i>'Contamination – a site contamination assessment in accordance with the Managing Land Contamination Planning Guidelines: SEPP55 – Remediation of Land (DUAP, 1998) and State Environmental Planning Policy (Resilience and Hazards) 2021 Chapter 4, including:</i></p> <ul style="list-style-type: none"> <li><i>• Characterisation of the nature and extent of any contamination on the site and surrounding area; and</i></li> <li><i>• A Detailed Site Investigation (DSI) and Remedial Action Plan (RAP), if the Preliminary Site Investigation indicates contamination is present and a DSI is required.'</i></li> </ul> | <p>Please refer to standalone documents:</p> <p>Combined PSI/DSI (JBS&amp;G 2026a)</p> <p>RAP (JBS&amp;G 2026b)</p>                                                                                                                                                                                                                                                                                                                |
| <p>NSW Health – Southwestern Sydney Local Health District (SWSLHD).</p> <p>Assessment / consideration to the requirements for managing the presence of asbestos on the site under the proposed development. Broad consideration to environmental impacts.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>Please refer to standalone documents:</p> <p>Combined PSI/DSI (JBS&amp;G 2026a) Sections 9, 10 and 11, presenting the assessment of potential risks.</p> <p>RAP (JBS&amp;G 2026b) with evaluation of appropriate remediation strategies and documentation of remediation / validation objectives and management measures to ensure protection of human health and the environment during and following completion of works.</p> |

In summary, the combined PSI/DSI (JBS&G 2026a) identified the occurrence of site contamination conditions that will require management/remediation to ensure the suitability of the site for the proposed future commercial/industrial land use. Subject to the successful implementation of the measures detailed in the RAP (JBS&G 2026b) it is considered the site can be made suitable for the intended uses and that the risks posed by contamination can be managed in such a way as to be adequately protective of human health and the environment, thereby satisfying the planning requirements listed in the SEARs, the Government Agency requirements and ultimately *State Environmental Planning Policy (Resilience and Hazards) 2021*. The proposed remediation works will occur under SSD 97711727 and therefore it is not anticipated that site contamination related remediation works will be required under the internal works SSD.

It is further noted that consent is being sought under the earlier consent SSD-97711727 for implementation of the remedial works as discussed in the RAP, such that, upon completion of the scope under the above consent, final validation reports will be prepared for each individual Lot (and/or stage) prior to the commencement of development works as proposed under this SSD-97688711 within each portion of the site. All works will be the subject of a technical review by the appointed NSW EPA accredited independent site auditor enabling issue for each Lot/stage Site Audit Statements (SASs) endorsing its suitability for the proposed commercial/industrial land use.

<sup>1</sup> *Planning Secretary's Environmental Assessment Requirements, Project Maverick – Internal Works, SSD-97688711*. Department of Planning, Housing and Infrastructure (DPHI), 24 November 2025 (DPHI 2025)

In summary, all remediation works will occur under SSD 97711727 and therefore it is not anticipated that site contamination related remediation works will be required under the internal works SSD, as such there is no requirement for the ongoing application of the RAP under this Consent.

Consistent with the intent of the overall works, it would be appropriate in lieu of the RAP application to ensure that only Virgin Excavated Material (VENM), Excavated Natural Material (ENM), or other material approved in writing by the NSW EPA (including via the Resource Recovery Order/Exemption framework) be brought onto the site for use as fill material.

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Should you require clarification, please contact the undersigned on 02 8245 0300 or by email [jrosner@jbsg.com.au](mailto:jrosner@jbsg.com.au).

Yours sincerely:

A handwritten signature in black ink, appearing to read "Joanne Rosner", written in a cursive style.

Joanne Rosner  
Senior Principal, Contaminated Land  
JBS&G Australia Pty Ltd

**Attachments:**

Attachment A      Limitations

## Attachment A Limitations

This report has been prepared for use by the client who has commissioned the works in accordance with the project brief only, and has been based in part on information obtained from the client and other parties. The report has been prepared specifically for the client for the purposes of the commission, and no warranties, express or implied, are offered to any third parties and no liability will be accepted for use or interpretation of this report by any third party.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose. This report should not be amended in any way without prior approval by JBS&G, or reproduced other than in full including all attachments as originally provided to the client by JBS&G.

Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements or agreed scope of work.

Limited sampling and laboratory analyses were undertaken as part of the investigations undertaken, as described herein. Conditions between sampling locations and media may vary, and this should be considered when extrapolating between sampling points. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

Changes to the conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigations.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein. Should information become available regarding conditions at the site including previously unknown sources of contamination, JBS&G reserves the right to review the report in the context of the additional information.